



October 2, 2002

Chairman Karen Getman  
Fair Political Practices Commission  
628 J Street, Suite 620  
Sacramento, CA 95814

Re: Proposed Regulation 18531.7 - Membership Communications

Dear Chairman Getman:

The California League of Conservation Voters is a non-profit corporation which is exempt from taxation under Section 501(c)(4) of the internal revenue code. CLCV has state and federal political action committees to support candidates who share our interests and goals.

Under our bylaws and practices, we have determined members to be individuals who pay regular dues in a specific amount, as determined by our board of directors. Members must subscribe to the purposes and policies of the corporation, and must meet any membership criteria as set forth by the board of directors. However our members do not have the right to vote for our board of directors.

We are concerned that proposed FPCC regulation 18531.7 would not encompass our members for purposes of membership communications under Government Code Section 85312. We understand that the purpose of Section 85312 is to allow organizations such as the California League of Conservation Voters communicate with members.

We would encourage you to adopt a definition of member which parallels the federal definition of membership for federal elections. We communicate with our members in mailings which relate to both federal and state elections.

We are not able to attend Friday's meeting but if you would like to discuss this issue further please feel free to call me at 510-271-0900 extension 302.

Yours truly,

Jon Rainwater  
Executive Director